

The Honorable James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NORTHWEST ENVIRONMENTAL
ADVOCATES,

Plaintiff,

v.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY,

Defendant.

CASE NO. 2:19-cv-01051-JLR

STIPULATED MOTION FOR AN
EXTENSION OF TIME AND
[PROPOSED] ORDER

Noted for: March 2, 2021

Plaintiff Northwest Environmental Advocates (“NWEA”) and Defendant United States Environmental Protection Agency (“EPA”) (collectively “the parties”), by and through counsel, submit this stipulated motion to extend NWEA’s deadline to file its motion for costs and attorneys’ fees from March 12, 2021 to May 26, 2021. Good cause exists for this extension.

The parties settled NWEA’s claim for cost and attorneys’ fees, which was the only remaining issue in this Freedom of Information Act litigation. The settlement provides that the parties will seek dismissal of this case with prejudice after EPA makes payment. If EPA does not make payment during the time allotted, or if this Court does not grant this motion, NWEA may declare the agreement null and void and file a motion for fees and costs with the Court. This extension will provide sufficient time for EPA to make payment and the parties

1 to seek dismissal with prejudice, or if necessary, for NWEA to file a motion for fees and
2 costs with the Court.

3 Accordingly, the parties request that the Court extend NWEA's deadline to file its
4 motion for costs and attorneys' fees to May 26, 2021.

5 Respectfully submitted this 2nd day of March 2021.

6
7 TESSA M. GORMAN
8 Acting United States Attorney

9 /s/ Michelle R. Lambert
10 MICHELLE R. LAMBERT, NYS #4666657
11 Assistant United States Attorney
12 United States Attorney's Office
13 1201 Pacific Avenue, Suite 700
14 Tacoma, Washington 98402
15 Phone: 206-428-3800
16 Fax: 253-428-3826
17 E-mail: michelle.lambert@usdoj.gov
18 *Attorneys for Defendant*

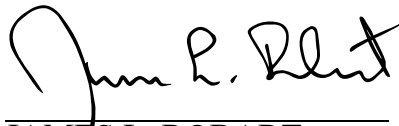
19 /s/ Paul Kampmeier
20 Paul Kampmeier, WSBA #31560
21 Kampmeier & Knutsen PLLC
22 811 First Avenue, Suite 468
23 Seattle, Washington 98104
24 Tel: (206) 858-6983
25 Email: paul@kampmeierknutsen.com
26 *Attorneys for Plaintiff*
27
28

[PROPOSED] ORDER

Good cause exists to extend Plaintiff's time to file a motion for costs and attorneys' fees. Plaintiff shall file its motion on or before May 26, 2021.

IT IS SO ORDERED.

Dated this 2nd day of March, 2021.



JAMES L. ROBART
United States District Judge